

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	
)	No. 20-CR-10098-WGY
BRIAN GILBERT, STEPHANIE POPP,)	
STEPHANIE STOCKWELL and)	
VERONICA ZEA)	
)	
Defendants)	
_____)	

DECLARATION OF FRANK R. UBHAUS IN SUPPORT OF SENTENCING
MEMORANDUM OF DEFENDANT VERONICA ZEA

I, Frank R. Ubhaus, Esq., do hereby state and depose as follows:

1. I am an attorney licensed to practice in the State of California and I am currently an “of counsel” to the Law Firm Berliner Cohen, LLP located at 10 Almaden Boulevard, 11th Floor, San Jose, California 95113. I have been admitted to practice on a *pro hac vice* basis in this Court and have been admitted to practice in the United States District Court for the Northern District of California, the United States Court of Appeal for the Ninth Circuit and the United States Supreme Court.

2. I represent the Defendant Veronica Zea in the above captioned matter and I make this Declaration in support of the Sentencing Memorandum submitted herewith on behalf of Veronica Zea.

3. Attached hereto marked Exhibit A is a letter I received from Anneli Olausson on Veronica Zea’s behalf. I spoke to Ms. Olausson regarding her employment in the Global

Intelligence Center at eBay and asked her to put her recollections of the work environment in a letter to the Court; the attached, although unsigned, is Ms. Olausson's response to my request.

4. Attached hereto as Exhibit B, C and D are letters written on Veronica Zea's behalf by her treating psychiatrist, Sharadha Raghavan, M.D. Exhibit B was written on Veronica's behalf in connection with her special needs in college, Exhibit C was written at my request for the Court's consideration early on in these proceedings, Exhibit D was written at my request as an update on Veronica's condition

5. Attached hereto marked Exhibit E is the Confidential Psychological Report prepared by Uplift Psychology Group with respect to Veronica Zea's autism spectrum disorder.

6. Veronica Zea has attended a number of Zoom conferences with Rosemary Scapicchio, the attorney for Ina and David Steiner in their pending civil suit in which Veronica Zea is a named defendant. In those Zoom conferences Veronica provided as much information as she could in response to questions posed to her by Ms. Scapicchio, in an effort to assist the Steiners in their litigation against eBay and the other defendants, including herself. Veronica participated in these conferences with no preconditions and no promises from the plaintiffs.

Signed under the pains and penalties of perjury this 21st day of October, 2022.

/s/ Frank R. Ubhaus

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Certificate of Service

I hereby certify that on this 21st day of October, 2022, this document was filed through the Court's ECF system and will therefore be sent electronically to the registered participants identified in the Notice of Electronic Filing.

/s/ Frank R. Ubhaus
Frank R. Ubhaus